

CENTER FOR DISABILITY ACCESS
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Attorneys for Plaintiff Shirley Lindsay

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Shirley Lindsay,
Plaintiff,

v.

3161 Los Feliz Blvd., LLC, a California
Limited Liability Company;
Aram Tsolakyan;
Gohar Grigorian; and Does 1-10,
Defendants.

) Case No.: 2:17-CV-02592-JFW-SS

)

) **JOINT SUMMARY OF WITNESS**
) **TESTIMONY**

)

) Pretrial Conference: January 19, 2018
) Time: 10:00 a.m.

)

) Complaint Filed: April 5, 2017
) Trial Date: January 30, 2018

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) Honorable Judge John F. Walter

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Pursuant to Local Rule 16-5 and F.R.Civ.P. 26(a)(3)(A), Plaintiff Shirley Lindsay and Defendants 3161 Los Feliz Blvd., LLC, Aram Tsolakyan, and Gohar Grigorian hereby submit their Witness List. All testimony will be in person unless otherwise indicated.

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NAME	EXPECTED TESTIMONY	EST. TIME FOR DIRECT
Shirley Lindsay	Ms. Lindsay will testify about (1) how the barriers at the Adam Tsolakyan, DDS dental office prevented her access; and (2) her desire to return to Adam Tsolakyan, DDS dental office.	45 to 60 minutes
Janis Kent	Ms. Kent is a designated expert. She will testify as to compliance or non-compliance with the Americans with Disabilities Act Accessibility Guidelines and Title 24 of the California Code of Regulations, and the cost and the feasibility of removing or remediating those barriers.	60 to 90 minutes
Evens Louis	Mr. Louis will testify about his inspection of the subject property and the photos he took on or about December 9, 2016 and December 14, 2016.	45 to 60 minutes
Aram Tsolakyan	Mr. Tsolakyan will testify about (1) his ownership interest in the subject property; (2) Condition of the subject property from the date of his purchase through present; (3) Financial condition of Aram Tsolakyan DDS; (4) All business aspects of Aram Tsolakyan DDS; (5) Aram Tsolakyan's efforts to make the property compliant with the Americans with Disabilities Act Accessibility Guidelines and Title 24 of the California Code of Regulations. (6) his position	60 to 90 minutes

	with 3161 Los Feliz Blvd., LLC as person most knowledgeable – now dissolved.	
Gohar Grigorian	Mrs. Grigorian will testify about (1) her role and ownership interest in the subject property.	30 to 60 minutes

Pursuant to Local Rule 5-4.3.4, the filer attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the content of this filing and have authorized this filing.

Dated: January 4, 2018

CENTER FOR DISABILITY ACCESS

By: /s/ Chris Carson

CHRIS CARSON
Attorneys for Plaintiff

Dated: January 4, 2018

ARMAN SAAKYAN & ASSOCIATES

“/s/” Arman Saakyan Esq.

By: _____

ARMAN SAAKYAN
Attorneys for Defendants